

SMITH & LOWNEY, P.L.L.C.
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April 23, 2015

RECEIVED ON:

Via Certified Mail - Return Receipt Requested

APR 27 2015

Managing Agent
Steeler, Inc.
540 E. 15th St.
Tacoma, WA 98421

EPA Region 10
Office of the Regional Administrator

Re: NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT

Dear Managing Agent:

We represent Puget Soundkeeper Alliance (“Soundkeeper”), 130 Nickerson Street, Suite 107, Seattle WA 98109. Any response or correspondence related to this matter should be directed to us at the letterhead address. This letter is to provide you with sixty days notice of Soundkeeper’s intent to file a citizen suit against Steeler, Inc. (“Steeler”) under section 505 of the Clean Water Act (“CWA”), 33 U.S.C. § 1365 for the violations described below.

I. Unpermitted Discharges

The CWA, 33 U.S.C. §§ 1311 and 1342, prohibits the discharge of pollutants, including stormwater associated with industrial activity, to waters of the United States, except as authorized by a National Pollutant Discharge Elimination System (“NPDES”) permit. Steeler has violated and continues to violate Section 301(a) of the CWA, 33 U.S.C. § 1311(a), by discharging pollutants from its facility located at or about 540 E. 15th St. Tacoma, WA 98421 (the “facility” or “site”) to waters of the United States without an NPDES permit. The facility subject to this notice includes any contiguous or adjacent properties owned or operated by Steeler.

Steeler conducts industrial activities at the facility, such as manufacturing of steel framing products, running and maintaining equipment and trucks, storing unprocessed and processed steel materials, coating and painting steel, and manufacturing prefabricated metal buildings and components. Stormwater and pollutants discharged from the facility are thus “stormwater discharges associated with industrial activity” subject to the 33 U.S.C. § 1311(a) prohibition on discharges of pollutants without NPDES permit authorization. *See also*, 33 U.S.C. § 1342(p) and 40 C.F.R. § 122.26(a), (b)(14), and (c).

Steeler discharges industrial stormwater and pollutants to the Thea Foss Waterway and/or Commencement Bay directly and/or via a stormwater drainage system. On information and belief these pollutants include zinc, turbidity, copper, and oil. These violations of the CWA have occurred on each day from April 23, 2010, through the present

during which there was a stormwater discharge from the facility, generally including days on which there has been at least 0.1 inch of precipitation, and continue to occur. Precipitation data from SeaTac International Airport identifying such days is appended to this notice of intent to sue. The violations alleged in this notice of intent to sue will continue until Steeler obtains and comes into compliance with a NPDES permit authorizing such discharges.

II. Industrial Stormwater General Permit requirements

The Washington Department of Ecology (“Ecology”) authorizes discharges of stormwater associated with certain industrial activities under the Industrial Stormwater General Permit, including those activities that Steeler conducts at the site, such as fabricated metal products (SIC Codes 34XX) and the manufacturing of products of sheet metal (SIC Code 3444).

The current Industrial Stormwater General Permit (“2015 Permit”) was issued by Ecology on December 3, 2014, effective January 2, 2015, and set to expire on December 31, 2019, (the “2015 Permit”). Should Steeler have or obtain 2015 Permit coverage for the facility, compliance with the 2015 Permit requires Steeler to correct the deficiencies identified below. Soundkeeper hereby provides notice of its intent to sue for these violations of the 2015.

1. Compliance with standards.

Condition S10.C. of the 2015 Permit requires permittees to apply all known and reasonable methods of prevention, control and treatment (“AKART”) to all discharges, including preparation and implementation of an adequate stormwater pollution prevention plan (“SWPPP”) and best management practices (“BMPs”). On information and belief, Steeler has not applied AKART to its discharges or implemented adequate BMPs at the facility, including structural source control BMPs to minimize the exposure of pollutants to precipitation, and stormwater treatment BMPs to remove pollutants prior to discharge.

2. Stormwater Pollution Prevention Plan

Condition S3.A.1. of the 2015 Permit requires permittees to develop and implement a SWPPP as specified. S3.A.2. specifies that the SWPPP must indicate the BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. On information and belief, Steeler has not prepared and implemented a SWPPP that specifies AKART and ensures discharges do not cause or contribute to violations of water quality standards.

Condition S3.A.3.a. of the 2015 Permit requires that BMPs in a permittee’s SWPPP be consistent with the Stormwater Management Manual for Western Washington (2012 edition) (“SWMMWW”), which is available on the internet at <http://www.ecy.wa.gov/programs/wq/stormwater/manual.html>. Alternatively, the SWPPP must include documentation that the BMPs included therein are demonstratively equivalent to those described in the SWMMWW, including proper selection, implementation and maintenance.

On information and belief, Steeler has not prepared and is not implementing a SWPPP that is consistent with this manual or that is demonstratively equivalent thereto, including the housekeeping and other operational BMPs, the structural source control BMPs, and the stormwater treatment BMPs identified in the SWMMWW.

Condition S3.B.4.b. of the 2015 Permit identifies mandatory BMPs that must be included in the SWPPP and implemented, unless the permittee clearly justifies why each omitted mandatory BMP is unnecessary, infeasible, or replaced by alternative and equally effective BMPs. On information and belief, Steeler is not implementing several BMPs identified in the 2015 Permit, including preventive maintenance BMPs to maintain the stormwater drainage systems, including a schedule or frequency for each maintenance task (S3.B.4.b.3.), having a spill prevention and emergency cleanup plan (S3.B.4.b.i.4.), provisions for employee training, including a training log (S3.B.4.b.i.5.), provisions for facility inspections, regular compliance certification, and recordkeeping (S3.B.4.b.i.6.), adequate measures to identify and eliminate the discharge of process wastewater (S3.B.4.b.i.7.), the “applicable” BMPs from the SWMMWW (S3.B.4.b.ii.1.), and location of industrial materials and activities inside or protecting them with storm resistant coverings (S3.B.4.b.ii.2.).

3. Monitoring

Condition S4.B.2. of the 2015 Permit requires permittees to sample quarterly each distinct point of discharge off-site except as otherwise exempt from monitoring as a “substantially identical outfall” per 2015 Permit Condition S3.B.5.b. Condition S4.B.3. of the 2015 Permit requires permittees to record and retain specified information about each stormwater sample taken, including a notation describing if they collected the sample within the first 12 hours of stormwater discharge events and, if not, an explanation why not. Condition S4.A. and B. of the 2015 Permit require permittees to collect stormwater samples no less than once per quarter. Condition S9.A. of the 2015 Permit requires permittees to report results of analysis of these samples to Ecology on specified forms (Discharge Monitoring Reports, or “DMRs”) on a specified schedule. Steeler has not collected stormwater discharge samples and/or reported the results to Ecology on DMRs.

III. Conclusion

The above-described violations reflect those indicated by the information currently available to Soundkeeper. These violations are ongoing. Soundkeeper intends to sue for all violations, including those yet to be uncovered and those committed after the date of this notice of intent to sue.

Under Section 309(d) of the CWA, 33 USC § 1319(d), each of the above-described violations subjects the violator to a penalty of up to \$37,500 per day for each violation. In addition to civil penalties, Soundkeeper will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 USC § 1365(a) and (d), and such other relief as is permitted by law. Section 505(d) of the CWA, 33 USC § 1365(d), also permits prevailing parties to recover costs, including attorney’s fees.

Soundkeeper believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. We intend, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Steeler, Inc. under Section 505(a) of the Clean Water Act for violations. During the 60-day notice period, we would be willing to discuss effective remedies for the violations addressed in this letter and settlement terms, however; we do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends. To initiate those discussions you may contact us by phone or mail (see letterhead), or by e-mail at elizabethz@igc.org or rasmithwa@igc.org

Sincerely,

SMITH & LOWNEY, PLLC

By: 
Richard Smith
Elizabeth H. Zultoski

cc: Gina McCarthy, Administrator, U.S. EPA
Dennis McLerran, Region 10 Administrator, U.S. EPA
Maia Bellon, Director, Washington Department of Ecology
MPBA Service Company LLC, 701 Fifth Ave. Ste. 5500, Seattle, WA 98104
Steve Parkinson, Joyce Ziker Parkinson, PLLC

Date	Precip. (in)						
2010	Precip. (in)	19	0.06	19	T	19	0
Apr	sum	20	0.21	20	0	20	0
23	0.05	21	0	21	0.01	21	T
24	0.08	22	0	22	0	22	0.05
25	0	23	0	23	0	23	0.38
26	0.18	24	0	24	0	24	0.72
27	0.29	25	T	25	0	25	1.08
28	0.13	26	0	26	T	26	0.19
29	0	27	0	27	0	27	T
30	0.04	28	0	28	0	28	0.07
2010	Precip. (in)	29	0	29	0	29	0.01
May	sum	30	0	30	0	30	0.39
1	0.01	2010		31	0.39	31	0.16
2	0.32	Jul	sum	2010		2010	
3	0.03	1	0.01	Sep	sum	Nov	sum
4	0.08	2	0.18	1	0	1	1.56
5	0.1	3	0	2	0	2	0.02
6	0	4	0.11	3	0	3	0
7	0	5	0	4	0.01	4	0
8	0	6	0	5	0	5	0.17
9	0	7	0	6	0.12	6	0.7
10	0.18	8	0	7	0.26	7	0.06
11	0	9	0	8	0.31	8	0
12	0	10	T	9	0.03	9	0.22
13	0	11	0	10	0	10	T
14	0	12	T	11	0	11	0.13
15	0	13	0	12	0	12	0
16	0.02	14	0	13	0	13	0.12
17	0.01	15	0	14	0	14	0.27
18	0.14	16	0	15	0.14	15	0.14
19	0.26	17	0	16	0.6	16	0
20	0.21	18	0	17	1.49	17	0.17
2010		19	0	18	0.78	18	0.2
May	sum	20	0	19	0.36	19	0.06
21	0.1	21	0	20	0.02	20	T
22	0.01	22	0.01	21	0	21	0.01
23	0.03	23	0	22	0	22	0.15
24	0	24	0	23	0.26	23	T
25	0.06	25	0	24	0	24	0
26	0.23	26	0	25	0	25	0.01
27	0.11	27	0	26	0.39	26	0.29
28	0.45	28	0	27	0.03	27	0.01
29	0.06	29	0	28	T	28	0.02
30	0.11	30	0	29	0	29	0.1
31	0.31	31	0	30	T	30	0.64
2010		2010		2010		2010	
Jun	sum	Aug	sum	Oct	sum	Dec	sum
1	0.15	1	0	1	0	1	T
2	0.37	2	0	2	0	2	T
3	0.03	3	0	3	0	3	0
4	0.18	4	0	4	0	4	0
5	0	5	0.02	5	0	5	T
6	0.33	6	0	6	0	6	0.01
7	0.01	7	0.19	7	0	7	0.35
8	0.25	8	0.03	8	0.12	8	0.51
9	0.25	9	T	9	1.21	9	0.89
10	0.18	10	0	10	0.74	10	0
11	0.1	11	0	11	0	11	1.42
12	0	12	0	12	0	12	2.19
13	0	13	0	13	0	13	0.46
14	0	14	0	14	0.12	14	0.82
15	0.19	15	0	15	0	15	0.11
16	0.18	16	0	16	0	16	0.02
17	0	17	0	17	0	17	0
18	0	18	0	18	0	18	0.08

Precipitation data—SeaTac Airport

Date	Precip. (in)						
19	0.14	18	0	20	T	18	0.41
20	0.03	19	0	21	T	19	0.03
21	0.01	20	0	22	T	20	0
22	0.01	21	0.03	23	0	21	0
23	0.25	22	0.04	24	0.18	22	0
24	0.44	23	0.24	25	0.52	23	0.07
25	0.32	24	T	26	0.01	24	0.26
26	0.09	25	0	27	0.45	25	0.01
27	0.44	26	T	28	0.04	26	0
28	0.01	27	0.47	29	T	27	T
29	0.09	28	0.42	30	0.13	28	T
30	0	2011		2011		29	T
31	0	Mar	sum	May	sum	30	0
2011		1	0.24	1	T	2011	
Jan	sum	2	0.07	2	0.18	Jul	sum
1	0	3	0.22	3	T	1	0
2	0	4	0.12	4	0	2	0
3	0	5	0.02	5	0.03	3	0
4	0.03	6	0	6	0.13	4	0
5	0.12	7	T	7	0.04	5	0
6	0.17	8	0.16	8	0.02	6	0
7	0.37	9	1.47	9	0	7	0.03
8	0.03	10	0.55	10	0	8	0.01
9	0.02	11	T	11	0.42	9	0
10	T	12	0.41	12	0	10	0
11	0.3	13	0.33	13	0	11	T
12	0.81	14	0.12	14	0.97	12	0.08
13	0.82	15	0.37	15	0.81	13	T
14	0.29	16	0.09	16	0	14	0.02
15	0.45	17	T	17	0	15	0.02
16	0.27	18	0.27	18	0	16	0.35
17	0.04	19	0	19	0	17	0.07
18	0.08	20	0.01	20	0	18	0
19	0	21	0.01	21	0.04	19	0
20	0.05	22	T	2011		20	0
21	0.51	23	0	May	sum	21	T
22	T	24	0.23	22	0	22	0
23	0.04	25	0.33	23	0	23	0
24	0.21	26	0.15	24	0	24	0
25	0	27	0.28	25	0.41	25	0.13
26	0	28	0.14	26	0.01	26	0
27	0	29	0.12	27	0.02	27	0
28	0.14	30	0.26	28	0.01	28	0
29	0.24	31	0.32	29	0	29	0
30	T	2011		30	T	30	0
31	0	Apr	sum	31	0.11	31	T
2011		1	1.13	2011		2011	
Feb	sum	2	0.37	Jun	sum	Aug	sum
1	0	3	0.06	1	0.17	1	0
2	0	4	0.24	2	0.08	2	0
3	0.01	5	0.23	3	0	3	0
4	0.07	6	0.12	4	0	4	0
5	0.08	7	0.08	5	0	5	T
6	0.25	8	0	6	0	6	0
7	0.05	9	0.01	7	0.21	7	0
8	T	10	0.16	8	T	8	0
9	0	11	T	9	0	9	0
10	0	12	0	10	0	10	0
11	0	13	0.17	11	0	11	0
12	0.37	14	0.4	12	0.01	12	0
13	0.24	15	0.09	13	0.11	13	0
14	0.54	16	0.06	14	0	14	T
15	0.09	17	0.01	15	0.06	15	0
16	0.04	18	0.01	16	0	16	0
17	0.11	19	0	17	0	17	0

Precipitation data—SeaTac Airport

Date	Precip. (in)						
18	0	18	0	18	0.19	17	0.68
19	0	19	T	19	0	18	0.25
20	0	20	T	20	T	19	0
21	0	21	0.12	21	0	20	0.12
22	0.12	22	0.58	22	0	21	0.03
23	0	23	0	23	0.02	22	0.34
24	0	24	0	24	T	23	0
25	0	25	0	25	0.03	24	0.45
26	0	26	0.02	26	0.05	25	T
27	0	27	0	27	0.9	26	0.05
28	0	28	0.5	28	0.63	27	0
29	T	29	0	29	0.29	28	0.14
30	0.01	30	0.16	30	0.07	29	0.03
31	0	31	T	31	0	2012	
2011		2011		2012		Mar	sum
Sep	sum	Nov	sum	Jan	sum	1	T
1	0	1	0	1	T	2	0.08
2	0	2	0.35	2	0.43	3	0
3	0	3	0	3	0.03	4	T
4	0	4	0.05	4	0.8	5	0.27
5	0	5	0	5	0.05	6	0.02
6	0	6	0	6	0.1	7	0
7	0	7	0.01	7	T	8	0
8	0	8	T	8	0	9	0.14
9	0	9	T	9	0.17	10	0.41
10	0	10	0	10	0.04	11	0.54
11	0	11	0.23	11	0	12	0.76
12	0	12	0.25	12	0	13	0.37
13	T	13	0.02	13	0	14	0.34
14	0	14	0	14	0.16	15	0.94
15	0	15	0	15	0.21	16	0.33
16	0	16	0.49	16	0.1	17	0.37
17	0.2	17	0.28	17	0.32	18	0.14
18	0.28	18	0.08	18	0.78	19	0.08
19	0.01	19	0	19	0.6	20	0.14
20	0	20	0	20	0.53	21	0.05
21	T	21	0.3	21	0.12	22	0.16
22	T	22	1.76	22	0.24	23	0
23	0	23	0.55	23	T	24	0
24	T	24	0.26	24	0.34	25	T
25	0.19	25	0	25	0.32	26	T
26	0.59	26	0.02	26	0.19	27	0.19
27	0.01	27	0.42	27	0	28	0.05
28	0	28	T	28	T	29	1.08
29	0	29	0.09	29	1.09	30	0.22
30	0.01	30	0	30	0.14	31	0.52
2011		2011		2012			
Oct	sum	Dec	sum	Feb	sum	Apr	sum
1	0.02	1	T	1	0.53	1	0.06
2	0.37	2	0.01	2	0	2	0
3	0.1	3	0	3	0	3	0.06
4	0.05	4	0	4	0	4	0
5	0.09	5	0	5	0	5	0.18
6	0.11	6	0	6	0	6	0.01
7	0.06	7	0	6	0	7	0
8	0.02	8	0	7	0.01	8	0
9	0.1	9	0	8	0.11	9	0
10	0.25	10	T	9	0.1	10	T
11	0.89	11	0.02	10	0.1	11	0.09
12	T	12	0	11	0.03	12	0.02
13	0	13	0	12	0.04	13	0
14	0.01	14	T	13	0.45	14	0
15	0	15	0.03	14	0.1	15	T
16	0	16	0	15	0	16	0.32
17	0	17	0	16	0.07	17	0.07

Precipitation data—SeaTac Airport

Date	Precip. (in)						
18	0.07	16	T	16	0	16	0
19	0.43	17	0	17	0	17	0
20	0.26	18	0.12	18	0	18	0.82
21	0	19	0.04	19	0	19	0.19
22	T	20	0	20	0	20	0.02
23	0	21	0	21	T	21	0.25
24	0.17	22	0.62	22	0	22	0.35
25	0.42	23	0.34	23	0	23	T
26	0.15	24	0	24	0	24	0.28
27	0.03	25	0.02	25	0	25	0
28	T	26	T	26	0	26	0.06
29	0.17	27	0	27	0	27	0.91
30	0.17	28	T	28	0	28	0.24
2012		29	0.01	29	0	29	0.43
May	sum	30	0.12	30	0	30	1.36
1	0.02	2012		31	0	31	0.57
2	0.02	Jul	sum	2012		2012	
3	0.73	1	T	1	0.08	Sep	sum
4	0.07	2		2	0	Nov	sum
5	0	3		3	0.23	1	0.38
6	0	4		4	0	2	0.22
7	0	5		5	0	3	0.02
8	0	6		6	0	4	0.32
9	T	7		7	0	5	0.03
10	0	8	T	8	0	6	0.01
11	0	9		9	0.06	7	T
12	0	10		10	0	8	T
13	0	11		11	0	9	T
14	0	12		12	0	10	T
15	0	13		13	0.02	11	0.6
16	0	14	T	14	0	12	0.14
17	T	15	T	15	0	13	0.21
18	T	16		16	0.01	14	0.03
19	0	17		17	0	15	0
20	0.25	18		18	0	16	0.22
21	0.55	19		19	0	17	0.24
2012		20		20	0.6	18	0.31
May	sum	21		21	0	19	2.13
22	0.24	22		22	0.04	20	0.15
23	0.01	23	T	23	0	21	0.44
24	T	24		24	0	22	T
25	T	25		25	0	23	1.26
26	0	26		26	0	24	T
27	0	27		27	0	25	0
28	T	28	T	28	0	26	0
29	0	29		29	0	27	0
30	0.01	30		30	0	28	0.11
31	0.15	31		31	0	29	0.06
2012		2012		2012		30	1.4
Jun	sum	Aug	sum	Oct	sum	Dec	sum
1	0.26	1	0	1	0	1	0.16
2	0.01	2	0	2	0	2	0.77
3	0	3	0	3	0	3	0.51
4	0.05	4	0	4	0	4	0.56
5	0.63	5	0	5	0	5	0.06
6	0	6	T	6	0	6	0.06
7	0.65	7	0	7	0	7	0.04
8	0.06	8	0	8	0	8	0
9	T	9	0	9	0	9	0.06
10	0	10	0	10	0	10	0.02
11	T	11	0	11	0	11	0.12
12	0.03	12	0	12	0.08	12	0.32
13	0	13	0	13	0.19	13	0.09
14	0	14	0	14	0.65	14	0.31
15	0	15	0	15	0.31	15	0.21

Precipitation data—SeaTac Airport

Date	Precip. (in)						
16	0.89	15	0	17	0	15	0
17	0.08	16	T	18	0.21	16	0
18	0.13	17	T	19	0.81	17	T
19	0.54	18	T	20	T	18	0.01
20	0.52	19	0	21	0.13	19	T
21	0.07	20	0.06	22	0	20	0.12
22	0.13	21	0.02	23	0	21	0.01
23	0.26	22	0.37	24	0	22	0
24	0.01	23	0.01	25	0	23	0.31
25	0.53	24	T	26	0	24	0.19
26	0.18	25	0.09	27	T	25	0.39
27	0.16	26	0.02	28	0.04	26	0.08
28	T	27	0.18	29	0.15	27	0.14
29	0.06	28	0.32	30	T	28	0
30	0	2013		2013		29	0
31	0	Mar	sum	May	sum	30	0
2013		1	0.16	1	0	2013	
Jan	sum	2	0.03	2	0	Jul	sum
1	0	3	0	3	0	1	0
2	0	4	0	4	0	2	0
3	0.16	5	T	5	0	3	0
4	0.1	6	0.47	6	0	4	0
5	0.12	7	0.29	7	0	5	0
6	0.08	8	0	8	0	6	0
7	0.09	9	0	9	0	7	0
8	0.64	10	0.03	10	0	8	0
9	1.51	11	0.05	11	0	9	0
10	0.01	12	0.08	12	0.26	10	0
11	0	13	0.09	13	0.13	11	0
12	0	14	0.11	14	0	12	0
13	0	15	T	15	0.04	13	0
14	0	16	0.17	16	T	14	0
15	0	17	0	17	0.02	15	0
16	0	18	T	18	T	16	T
17	0	19	0.46	19	T	17	T
18	0	20	0.39	20	0	18	0
19	0	21	0.32	21	0.54	19	0
20	0	22	0	2013		20	0
21	0	23	0	May	sum	21	0
22	0	24	0	22	0.54	22	0
23	0.2	25	0	23	0.16	23	0
24	0.23	26	0	24	0.01	24	0
25	0.12	27	0.01	25	T	25	0
26	0.09	28	0.08	26	0.06	26	0
27	0.07	29	T	27	0.38	27	0
28	0.31	30	0	28	0.02	28	0
29	0.17	31	0	29	0.22	29	T
30	0.14	2013		30	T	30	0
31	0.12	Apr	sum	31	0	31	0
2013		1	0	2013		2013	
Feb	sum	2	0	Jun	sum	Aug	sum
1	0.01	3	0	1	T	1	0
2	0	4	0.33	2	0.04	2	0.08
3	0.09	5	0.73	3	0	3	T
4	T	6	0.5	4	0	4	0
5	0.13	7	1.54	5	0	5	0
6	0.04	8	0.03	6	0	6	0
7	0.05	9	T	7	T	7	0
8	0	10	0.37	8	0	8	0
9	0.01	11	0.06	9	0	9	T
10	0	12	0.38	10	0	10	0.09
11	0.01	13	0.37	11	0	11	0
12	0.04	14	0.23	12	0.01	12	0
13	0.09	15	T	13	0	13	0
14	0.04	16	0.01	14	0	14	0.03

Precipitation data—SeaTac Airport

Date	Precip. (in)						
15	0.07	15	0	15	0.05	14	0.37
16	0	16	0	16	0.01	15	0.46
17	0	17	0	17	0	16	1.04
18	0	18	0	18	0.05	17	0.57
19	0	19	0	19	0	18	0.6
20	0	20	0	20	0.22	19	0.04
21	0	21	0	21	0.22	20	0.12
22	0	22	0	22	0.42	21	0.11
23	T	23	0	23	0.06	22	0.1
24	0	24	0	24	0	23	0.24
25	0.01	25	0	25	0	24	0.51
26	0.04	26	0	26	0	25	0.01
27	0.05	27	0.07	27	0.01	26	0
28	0.22	28	0	28	0	27	0
29	0.76	29	0	29	0	28	0
30	0	30	0.02	30	0.01		2014
31	0	31	0.01	31	0.02	Mar	sum
2013		2013		2014		1	0.02
Sep	sum	Nov	sum	Jan	sum	2	0.75
1	0	1	0.05	1	T	3	0.42
2	T	2	0.5	2	0.16	4	0.65
3	0.09	3	0.02	3	0.06	5	1.84
4	0.01	4	T	4	0	6	0.12
5	1.09	5	0.1	5	0	7	0
6	0.84	6	0.15	6	0.01	8	1.27
7	0	7	1.18	7	0.48	9	0.17
8	0	8	0	8	0.38	10	0.74
9	0	9	0.07	9	0.23	11	0
10	0	10	T	10	0.17	12	0
11	0	11	0	11	0.84	13	0
12	0	12	0.16	12	0.06	14	0.27
13	0	13	0	13	0	15	0.32
14	0	14	0.05	14	T	16	1.09
15	0.13	15	0.12	15	0	17	0.01
16	0.01	16	0	16	0	18	T
17	T	17	0.21	17	0	19	0.02
18	0	18	1.03	18	0	20	0
19	0	19	0.04	19	0	21	0
20	0.14	20	0	20	0	22	0
21	T	21	0	21	0	23	0
22	0.53	22	0	22	0.02	24	0
23	0.11	23	0	23	0	25	0.16
24	T	24	0	24	0	26	0.14
25	0.08	25	0	25	0	27	0.01
26	0	26	T	26	0	28	0.87
27	0.04	27	0	27	0	29	0.55
28	1.71	28	0	28	0.35	30	0
29	0.66	29	0.02	29	0.85	31	0
30	0.73	30	0.09	30	0		2014
2013		2013		31	0.09	Apr	sum
Oct	sum	Dec	sum	2014		1	0
1	0.31	1	0.12	Feb	sum	2	0
2	0.21	2	0.18	1	0.08	3	0.1
3	0.03	3	0	2	0	4	T
4	0	4	0	3	0	5	0.18
5	0	5	0	4	0	6	0
6	0.16	6	0	5	0	7	0
7	0.02	7	0	6	T	8	0.18
8	0.27	8	0	7	T	9	0
9	0	9	0	8	0.2	10	0
10	0.04	10	0	9	0.02	11	0
11	0.36	11	0	10	0.72	12	0
12	0.04	12	0.27	11	0.67	13	0
13	0	13	0.02	12	0.18	14	0
14	0	14	T	13	0.07	15	0.02

Precipitation data—SeaTac Airport

Date	Precip. (in)						
16	0.43	14	0	14	T	14	0.28
17	0.73	15	0.02	15	0.04	15	0.34
18	0	16	0.14	16	0	16	T
19	0.54	17	0.05	17	0	17	0.13
20	0	18	0	18	0	18	0.59
21	0.2	19	0.03	19	0	19	0
22	0.56	20	0.01	20	0	20	0.46
23	0.35	21	0	21	0	21	0.04
24	0.49	22	0	22	0	22	1.26
25	0	23	T	23	0	23	0.37
26	0.13	24	0	24	0	24	0.16
27	0.27	25	0	25	0	25	0.24
28	0	26	T	26	0	26	0.06
29	0	27	0.07	27	0	27	0.03
30	0	28	0.09	28	0	28	0.5
2014		29	T	29	T	29	0.02
May	sum	30	0	30	0.33	30	1
1	0	2014		31	0.05	31	0.67
2	T	Jul	sum	2014		2014	
3	1.31	1	0	Sep	sum	Nov	sum
4	0.63	2	0	1	0	1	0
5	0.2	3	0	2	0.12	2	0.07
6	0	4	0	3	0	3	0.43
7	0	5	0	4	0	4	0.16
8	0.54	6	0	5	0	5	0.19
9	0.08	7	0	6	0	6	0.16
10	0.02	8	0	7	0	7	0
11	0	9	0	8	T	8	0
12	0	10	0	9	T	9	0.2
13	0	11	0	10	0	10	0
14	0	12	0	11	0	11	0
15	0	13	T	12	0	12	0
16	0	14	0	13	0	13	0
17	0	15	0	14	0	14	0
18	T	16	0	15	0	15	0
19	0	17	0	16	T	16	0
20	0	18	0	17	0.02	17	0
21	0	19	0	18	0.01	18	0
2014		20	0	19	0	19	T
May	sum	21	0	20	0	20	0.14
22	0	22	0.01	21	0	21	0.6
23	0.15	23	0.76	22	0.01	22	0.02
24	0	24	T	23	0.72	23	0.47
25	0.22	25	0	24	0.8	24	0.05
26	0	26	0	25	0.17	25	0.72
27	0	27	0	26	0.35	26	0.01
28	T	28	0	27	0	27	0.13
29	0	29	0	28	0	28	1.35
30	0	30	0	29	0.03	29	0.14
31	0	31	0	30	T	30	0
2014		2014		2014		2014	
Jun	sum	Aug	sum	Oct	sum	Dec	sum
1	0	1	T	1	0	1	0
2	0	2	0.02	2	0	2	0
3	0	3	0	3	0	3	0
4	0	4	0	4	0	4	0.03
5	0	5	0	5	0	5	0.12
6	0	6	0	6	0	6	0.29
7	0	7	0	7	0	7	0
8	0	8	0	8	0	8	0.36
9	T	9	0	9	T	9	0.39
10	0	10	0	10	0.01	10	0.51
11	0	11	0.02	11	0.29	11	0.27
12	0.07	12	0.5	12	T	12	T
13	0.25	13	0.85	13	0.3	13	T

Precipitation data—SeaTac Airport

Date	Precip. (in)						
14	0	13	0	13	0.55		
15	0	14	0.01	14	0.13		
16 T		15	0	15	0		
17	0.11	16	0	16	0		
18	0.51	17	0	17	0		
19	0.12	18	0	18	0		
20	0.77	19	0.18	19	0		
21	0	20	0.03	20	0		
22	0	21	0	21	0.22		
23	0.81	22	0	22	0.01		
24	0.21	23	0				
25	0	24	0				
26	0	25	0.16				
27	0.13	26	0.37				
28	0.16	27	0.72				
29	0	28	0				
30	0			2015			
31	0			Mar	sum		
				1	0		
2015				2	0		
Jan	sum			3	0		
1	0			4	0		
2	0.06			5	0		
3 T				6	0		
4	0.4			7	0		
5	0.32			8	0		
6	0			9	0		
7	0			10	0.03		
8	0			11	0.08		
9	0.01					2015	Temp. (°F)
10	0.23					Mar	high
11	0.06					12	64
12 T						13	63
13	0					14	57
14	0					15	51
15	0.38					16	57
16 T						17	56
17	1.03					18	60
18	0.84					19	60
19	0.02					20	57
20	0					21	56
21	0					22	53
22	0.03					23	52
23	0.23					24	55
24	0.02					25	58
25	0					26	69
26	0					27	65
27	0.03					28	60
28 T						29	60
29	0					30	64
30	0					31	55
31	0						
		2015	Temp. (°F)				
Feb	sum			Apr	high		
1	0.06			1	55		
2	0.29			2	56		
3	0.05			3	52		
4	0.33			4	55		
5	1.03			5	62		
6	0.68			6	57		
7	0.93			7	58		
8	0.14			8	63		
9	0.24			9	0		
10	0.01			10	0.43		
11 T				11	T		
12	0.04			12	0		

Precipitation data—SeaTac Airport